

RCRA FACILITY ASSESSMENT EVALUATION
PRELIMINARY REVIEW AND VISUAL SITE INSPECTION

Region VI, Technical Compliance Section

FACILITY'S NAME(S): SDS Biotech (Fermenta Plant Protection Co).

EPA ID NUMBER: TXD000836486

ADDRESS: 2239 Haden Road, Houston, Texas

LOCATION: Houston, Texas

DATE OF INSPECTION: Not given in RFA

SITE DESCRIPTION: Not given in RFA

PREPARED BY: David Savage-TWC DATE PREPARED: June 8, 1987

REVIEWED BY: Renee Kennedy DATE REVIEWED: _____

ANTICIPATED DRAFT PERMIT DATE: July 1987

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION:
Groundwater Corrective Action Plan for the General Landfill, GW assessment program (proposed) for the stormwater retention basin. Corrective action plan for the sludge drying basin. GW compliance plan, GW recovery and treatment program for the neutralization basin.

DOES FACILITY HAVE A CERCLA FILE? YES X NO _____

Has a CERCLA PA/SI performed at this facility: No

DOES FACILITY HAVE UIC WELL? YES _____ NO X

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS:
25 water wells within 1 mile of facility (Industrial and Residential).

TARGET POPULATION WITHIN A 3-MILE RADIUS:
The nearest residential area is immediately north of the railroad tracks, which are adjacent to the southern facility boundary. No further details were given.

RECOMMENDATIONS: _____ S.V. X R.F.I. _____ I.M. _____ No Further Action under RFA

(Indicate only one unless I.M. is marked)

_____ 3004(v) _____ 3007

Possible Enforcement Action: _____ 3008(a) _____ 3008(h)



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1. Preliminary Review of Prior or Continuing Releases of Solid Waste Management Units (SWMU)

A. Evaluation of Information

1. The main purpose is to determine whether there has been or may have been a release(s) of hazardous waste or hazardous constituents from any SWMUs which will require corrective action measures under Section 3004(u) of the RCRA Hazardous and Solid Waste Amendments (HSWA) of 1984. The SWMUs of concern are:
 - a) SWMUs not regulated under RCRA; and
 - b) SWMUs regulated under RCRA regardless of whether they are subject to ground water monitoring requirements.
2. The purpose of this review is to:
 - a) Identify all SWMU;
 - b) Identify if there have been prior or continuing releases of hazardous wastes or hazardous constituents from such units to any media (air, surface water, ground water, soil & sub-surface gas);
 - c) Determine if such releases caused environmental contamination that would require corrective action; and
 - d) Determine what additional information or investigation is needed to clarify whether there has been a release or if a potential for a release exists.

II. Visual Site Inspection

A. Purpose

- * Verify PR Information
- * Identify additional releases
- * Assess Condition of Solid Waste Management Units (SWMU)
- * Determine Sampling Locations for a Sampling Visit when applicable

B. NUMBER OF SWMU INVESTIGATED DURING THE PR/VSI: 21

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBJECT TO GWM*** SUBPART F</u>
1) Landfill (unlined) (AlphaBeta)	Y	I,C1	N
2) Landfill (unlined, NOR 04)	Y	I,C1	N
3) Outdoor Container Storage Area	I	I,C1	N
4) Surface Impoundment (NOR 06)	Y	A	Y
5) Surface Impoundment (NOR 07)	Y	A	?
6) Surface Impoundment (NOR 02)	Y	I,C1	Y

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBJECT TO GWN*** SUBPART F</u>
7-10) Four Tanks Above Grade	Y	A	N
11) Above Grade Tank	Y	A	N
12) Dumpsters	Y	A	N
13) Stormwater Treatment Sludge Container Area	Y	A	N
14) Dumpsters for Solid Materials	N	A	N
15) Waste Container Storage Area	N	A	N
16) Covered Container Storage Area	Y	A	N
17) Temporary Container Storage Area	Y	A	N
18) Wastewater Sumps	Y	A	N
19) Tank, Above-Grade (NCR 20)	Y	A	N
20) Surface Impoundment (NCR 21)	?	I,CI	?
21) Tank, Above-Grade (NCR 23)	Y	A	N

C. NUMBER OF SWMU IDENTIFIED DURING THE VSI (NOT IDENTIFIED IN THE PR): 0

D. NUMBER OF SWMU AT WHICH RELEASES HAVE BEEN IDENTIFIED: 3

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
1) Landfill (NCR 04) unlined	Y	GW, SW	Arsenic concentrations of up to 3600 mg/l were measured in the groundwater while water from the HCF-CD channel showed conc. of 6 mg/l. In 1980, a containment envelope was designed and constructed consisting of a continuous slurry trench around the disposal area and a uniform clay cap was put over the entire site. Continued monitoring during and after the waste area closure and the construction of the slurry wall and clay cap indicated continuing releases. In July 1985, measured conc. of 710 mg/l in the groundwater (MW-3) and 2.65 mg/l in the surface water in the HCF-CD channel downstream of

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
			the landfill. A subsurface groundwater recovery system is located along the HCF-CD channel on the east side of the Retired Waste Disposal Area.
2) Surface Impoundment (NOR 07)	Y	GW, Soil	Preliminary investigation to evaluate closure requirements.
3) Surface Impoundment (NOR 21)	?	GW	Groundwater west of the unit is being monitored for TOC and specific conductivity.

E. NUMBER OF SWMU (REGULATED) AT WHICH RELEASES TO GROUNDWATER HAVE BEEN IDENTIFIED: 2

<u>LIST OF SWMU</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
1) Surface Impoundment (NOR Facility No. 6)	2 significant increases in pH have been discovered in wells assigned to the stormwater basin (CME July 15, 1986). During the CME water samples from MW 5 indicated an arsenic level of 0.17 mg/l.
2) Surface Impoundment (NOR Facility No. 8)	Carbon tetrachloride, total organic carbon specific conductance and pH have been used to assess contaminant migration.

F. NUMBER OF SWMU AT WHICH A RELEASE IS HIGHLY POSSIBLE: 0

G. NUMBER OF SWMU WHERE A DETERMINATION OF RELEASE CAN NOT BE MADE DUE TO LACK OF INFORMATION: 1

<u>LIST OF SWMU</u>	<u>RATIONALE</u>
1) Landfill (unlined)	Unknown if groundwater contamination has occurred, shallow depth to groundwater, unlined, contained hazardous constituents

- H. NUMBER OF SWMU WITH NO INDICATED RELEASES: 15
(Documentation is necessary for a SWMU to be included in this category.)

LIST OF SWMU

- 1) Outdoor Container Storage Area
- 2) Above-Ground Tank
- 3-6) Above-Ground Tank (4)
- 7) Dumpsters
- 8) Stormwater Treatment Sludge Containers Area
- 9) Dumpsters for Solid Materials
- 10) Waste Container Storage Area
- 11) Covered Container Storage Area
- 12) Temporary Container Storage Area
- 13) Wastewater Sumps
- 14) Above-Ground Tank (NOR 20)
- 15) Tank Above-Ground (NOR 23)

- I. NUMBER SWMU TO BE INCLUDED IN THE RFI: 2

LIST OF SWMU

RATIONALE

- | | |
|---|------------------------|
| 1) AlphaBeta Landfill (Closed) | See Part G for Details |
| 2) Surface Impoundment (Wastewater Ponds) | See Part D for Details |

- J. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 0

- K. ARE FACILITY MAPS/PHOTOS INCLUDED WITH ORIGINAL VSI REPORT? YES X NO

II. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

TWC

TWC recommends a RFI for several units." (See Part I).

EPA

EPA agrees with TWC's recommendations.

ADDITIONAL COMMENTS:

The following units were acknowledged to be leaking and that corrective action would be addressed in the Compliance Plan being developed with the permit:

- PR ID No.
- 04 Surface Impoundment-Closed General Landfill
- 08 Surface Impoundment-Closed Neutralization Pits
- 21 Surface Impoundment-Closed Sludge Drying Beds

CONCUR: _____

DATE: _____